

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**ELANDER WOODALL, Individually and
on Behalf of All Others Similarly Situated**

Plaintiff,

v.

**EVERGREEN PACKAGING, LLC AND
PACTIV EVERGREEN, INC.,**

Defendants.

Case No. 1:23-CV-459

Honorable Steven C. Seeger

JOINT STATUS REPORT

Pursuant to this Court's July 26, 2024, Order [Dkt. 80], Plaintiff Elander Woodall, and Defendants Evergreen Packaging LLC and Pactiv Evergreen Inc., hereby submit this Joint Status Report to bring the Court up to speed on the status of the case:

1. On August 15, 2024, Plaintiff served her Rule 26(a)(1) Initial Disclosures. Defendants served their Rule 26(a)(1) Initial Disclosures on August 30, 2024, per this Court's July 26, 2024 Order. [Dkt. 80].

2. Both Parties have also exchanged written discovery and Defendants have responded to Plaintiff's written discovery and produced relevant documents. Plaintiff is set to respond to Defendant's written discovery by November 25, 2024.

3. Consistent with the Parties' Proposed Scheduling Order, Defendant anticipates taking up to three depositions, including that of the Named Plaintiff, prior to the close of the Initial Discovery Phase.

4. Plaintiff does not anticipate the need for any depositions beyond a potential Rule 30(b)(6) deposition.

5. The Parties remain on track to engage in formal or informal settlement discussions at the close of the Initial Discovery Phase.

Dated: November 15, 2024

Respectfully submitted,

Elander Woodall

/s/ Josh Sanford

One of Her Attorneys

Josh Sanford

SANFORD LAW FIRM, PLLC

Kirkpatrick Plaza

10800 Financial Centre Pkwy, Suite 510

Little Rock, Arkansas 72211

josh@sanfordlawfirm.com

Respectfully submitted,

Evergreen Packaging LLC and Pactiv
Evergreen Inc.

/s/ John A. Ybarra

One of Its Attorneys

John A. Ybarra, Bar No. 6196983

jybarra@littler.com

Shanthi V. Gaur, Bar No. 6224996

sgaur@littler.com

Matthew J. Ruza, Bar No. 6321424

mruza@littler.com

LITTLER MENDELSON, P.C.

321 North Clark Street

Suite 1100

Chicago, IL 60654

Telephone: 312.372.5520